

Claims 1-13 are pending and claims 1-7 stand rejected. Applicants gratefully acknowledge that claims 8-13 are allowed. Applicants gratefully acknowledge that claim 5 would be allowable but for its dependence on a rejected base claim. Claims 1-5, 12 and 13 have been amended and claim 14 is new to more particularly point out and distinctly define the present invention over the prior art of record. Support for the amendments may be found at least in the FIGS. and specification as originally filed.

Claims 1-14 are pending and under consideration. Reconsideration is respectfully requested. No new matter has been added.

**102(e) rejection of claims 1-5 and 7:**

Claims 1-4 and 7 were rejected under 35 U.S.C. 102(e) as being anticipated by Ting et al. (U.S. Patent No. 6,922,183). The foregoing rejections are respectfully traversed.

Regarding the Yamamoto reference:

The Applicants respectfully submit that Ting fails to disclose the all of the features as recited in claim 1, for example. Specifically, Ting fails to teach "a plurality of storage electrode lines formed on the first insulating substrate and including a storage electrode . . . a coupling electrode connected to one of the first pixel electrode and the second pixel electrode and overlapping the other of first pixel electrode and the second pixel electrode, wherein the coupling electrode partially overlaps the storage electrode," as recited in claim 1, for example.

In contrast, in FIGS. 9 and 10 relied upon by the Examiner, Ting is absent any disclosure of a storage electrode, nevertheless a plurality of storage electrode lines formed on the first insulating substrate and including a storage electrode. Thus, since Ting is absent any disclosure of a "storage electrode", Ting is inherently absent any disclosure of the coupling electrode (902, 1002) partially overlapping the storage electrode.

Further, it is noted that the Examiner improperly equates elements (902 and 1002) to the claimed pixel electrodes, coupling electrode and first thin film transistor on pages 2 and 3 of the Detailed Action. Ting discloses with respect to FIGS. 9A, 9B, 10A and 10B that elements "902" and "1002" are each a storage capacitor electrode formed below the second sub-pixel electrode SP2(m,n) and/or the first sub-pixel electrode SP1(m,n). ((Col. 6, Ins 52-63 and col. 7, Ins 1-11).

More specifically, Applicants respectfully submit that Ting does not teach or suggest "a plurality of storage electrode lines formed on the first insulating substrate and including a storage electrode . . . a coupling electrode connected to one of the first pixel electrode and the second

pixel electrode and overlapping the other of first pixel electrode and the second pixel electrode, wherein the coupling electrode partially overlaps the storage electrode” as recited in claim 1, for example. Thus, the present invention as recited in claim 1, for example, patentably distinguishes over Ting. Accordingly, claim 1, including claims depending therefrom, i.e., claims 2-7, define over Ting and thus, withdrawal of the rejection is respectfully requested.

**103(a) rejection of claim 6:**

Claim 6 was rejected under 35 U.S.C. 103(a) as being unpatentable over Ting in view of Kim et al. (U.S. Patent No. 6,473,142). The foregoing rejection is respectfully traversed.

Based upon the comments mentioned above, Ting fails to disclose all of the features of claim 1 from which dependent claim 6 directly depends. Thus, although Kim discloses a multi-domain LCD device where the multi-domain is obtained by dividing each pixel into four domains, for example (see column 6, lines 1-4), Kim fails to make up for the deficiencies of Ting as mentioned above.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or discuss all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See M.P.E.P. § 2142.

Therefore, the combination of the foregoing references fails to provide a *prima facie* case of obviousness over the present invention.

Thus, withdrawal of the rejection is respectfully requested.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

Applicants hereby petition for any necessary extension of time required under 37 C.F.R. 1.136(a) or 1.136(b) which may be required for entry and consideration of the present Reply.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 06-1130.

Respectfully submitted,

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